UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Chris Sevier Plaintiff V. Apple Defendant		CASE NO: 3:13-cv-0607 JURY DEMAND THE HONORABLE JUDGE CAMPBELL

RESPONSE TO THE MAGISTRATE JUDGE'S REQUEST FOR AN EXPLANATION REGARDING THE DELAY IN SERVICE OF PROCESS

Now Comes I, Chris Sevier, in response to the Court's request that I provide an explanation for the delay in service of process. There are a few reasons for the delay in service of process in this case that I ask the Court to excuse.

First, I made clear on the face of the complaint that I was asking that Apple to "sua sponte" agree to comply with my demand found in my proposed rule 68 offer of settlement. Asking Apple to comply with child obscenity laws, by selling all of their products on "safe mode" is not asking too much under the lens of any cost benefit analysis. The United States Supreme has long since favored out of Court resolutions. Delay increased the chances of that given my posturing. Further, our Government and laws have long since recognized that porn is not "harmless speech." My proposed plan would decrease the demand side of sex trafficking and child pornography, safe guard against the wrongful objectification of women, and protect the institution of traditional marriage, which is constantly under attack. I have been hoping that Apple would have the decency and common sense to come forward on its own and place the our children's innocence before its own greed. My paramount demand here would put a minimal burden on Apple, while having tremendous benefits for the world, pushing back towards

innocence. As other Court's in the middle district have observed, once I effect service, the defendants can expect me to fight tooth and nail over these matters, but at this point, I have temporarily delayed pursuant to the Biblical principle that "blessed are the peacemakers."

Second, it was not by coincidence that the British Prime Minister called for the imposition of a plan in Parliament that squarely mirrored the relief in my complaint a weeks after my complaint made international news. (The British Prime Minister literally borrowed some of the language from my complaint). The British Prime Minister spoke well when he indicated that this common policy is not about legislating morality but about being responsive to the objective/scientific evidentiary record that online porn is causing systemic problems throughout the world. "What one cannot get in the stores, one should not be able to get online," stated the British Prime Minster. The British Prime Minister called for the United States to entered into a joint task force with our brothers and sisters in the United Kingdom to make device makers comply with child obscenity laws online. The free flow of information on line is not just bad for the economy, it is corrosive to our metaphysical, physiological, psychological, and emotional make up. The joint task force would require device makers sell their products on safe mode with the option to "opt in" to view porn if the purchaser can provide proof that they are not a minor and take the affirmative steps to seek access to illicit content. I, acknowledge that I am a merely a non-attorney layperson of no skill and significance, making such a demand here against a corporate giant like Apple,, but I hoped that Apple and the Federal Congress would have the common sense to respond to the call of the British Prime Minister to impose policies regarding a matter that is poising the hearts of our youth and threatening the institution of traditional marriage, increasing the demand side of child pornography, cultivating sexual compulsive behavior, proliferating arousal addiction, objectifying women, hijacking dopamine receptors, and devastating the

capacity for intimacy. Although Apple has no duty to porn content providers, Apple does have an affirmative duty to protect customers from being harmed by the use of their products. Delay in service was commissioned in hopes that Apple would respond to the British Prime Minister's calling, as a matter of common sense and decency.

Third, the Tennessee Supreme Court in all of its abundant glory and wisdom held that I suffer from combat related Post Traumatic Stress Disorder, which is a service connected injury sustained overseas in a foreign theater of war, to such a severe extent that it completely prohibits me from practicing law whatsoever (even though I'm practicing law as you read this). As the lawsuit against Congressman Windle that was before Judge Trauger showed, it is politically expedient for my opponents to make a range of false mischaracterizations about myself to discredit me for attempting to blow the whistle on them. This Court, specifically, will recall that at the time the Supreme Court made that tainted decision, I had a pending lawsuit before this Court against the BPR agents Nancy Jones and Krisann Hodges, agents of the Tennessee Supreme Court's Board of Professional Responsibility. That is, at the time I the TNSC found as they did, I had effectively sued the TNSC. Nevertheless, their decision is on record. Accordingly, I am entitled to invoke the Tolling provisions of the Service Members Civil Relief Act, which began to run at the time of injury and continues to date. Therefore, there is a valid legal basis grounded in federal law and patriotism that protects the delay. All time lines in this matter are blanketed by the tolling provisions of SCRA, and I will spare the Court and Apple at this time by not result to my training as a Judge Advocate General, providing a complete analysis of the application of this Federal statute that is designed to prevent Court's from engaging in the dishonorable practices of using a Soldier's voluntary military service as a mechanism to prejudice his interest in the fulfillment of illegitimate ulterior purposes. At this time, such

degenerate and Anti-American tactics should be left to the Tennessee state Courts, not Federal ones.

Fourth, this Court is well aware of the fact that I am making colorable efforts to combine my lawsuit against Hewlett Packard with this one. Both the HP and Hewlett Packard lawsuit appeared before this Court. I filed a separate lawsuit against Hewlett Packard which arises from the same common nucleus of facts and should be consolidated with this action under supplemental jurisdiction to preserve judicial economy. Very obviously, this Court should know that it is my intention to file an amended complaint that adds Hewlett Packard in a consolidated action. I do not even need the Court's permission to do so under rule 15 because I have yet to serve Apple with the original complaint. I have delayed service in good faith for this reason. I initially filed the Hewlett Packard lawsuit separately because I wanted to see if HP would be the initiator, as opposed to Apple, to take the moral high ground on a matter that we all know that the Federal and state Congress's are eventually going to come around to regulate anyway because it is self-evident that my proposal is appropriate, logical, honorable, and just. The Federal Congress can regulate interstate commerce by insisting that device makers make good faith efforts to comply with child obscenity laws. The proposal here places limited restrictions on the time, manner, and place of harmful speech. The implementation of this policy to place reasonable limitations on smut should equally apply to the digital world, as it does in the analogy one. Accordingly, before I proliferate acrimonious litigation that lards the Court's docket and causes Apple and HP to bleed out in attorney's fees, I was trying to provide some breathing room for Apple, HP, and the Federal Congress to wrap their minds around a different way for viewing the internet and online porn. Many people in the past have sued the wrong targets in trying to preserve their rights that are trampled by the lack of actual regulation online. Prospective "out-

side-the box" concepts warrant extra time. But what is not so foreign is that the parities and Court should immediately understand that there is something inherently wrong with making customers who want to avoid looking at porn to have to take the steps to do so. The burden should very obviously be shifted onto those who want to see such content to take the steps to acquire access. Apple is in the best position to install filters and the burden on Apple is light. Metaphorically speaking, even the Devil would prefer that Adam and Eve intentionally bit the Apple, as opposed to the alternative.

Fifth, I have delayed in effecting service because I have been living in Paris France. This Court knows or should know that I am an overseas missionary. In the last few months, I've been to Haiti, Ireland, London, Peru, and elsewhere on mission trips, not to curry favor with anyone but because that is who I am. I went to Paris to work with mobilized local churches to minister to the homeless. Additionally, in Paris, I was lobbying deputies from the National Assembly Socialist Party, like Maud Oliver, to join the British Prime Ministers call to form a joint task force with the United States to block smut online in their nation. (Deputy Oliver and others have been promoting policies that crack down on prostitution, which is addressing the symptom of a larger problem, the condition of the human heart.) Lobbying took a bit more time than I anticipated, and I did get caught up a bit too much in the DJ music scene in Paris.

Additionally, there is a temporary "area restriction" in place from a general sessions Judge that prevents me from physically going to the Federal Court house to request that the clerk issue summons. This restriction will likely be lifted on October 30, 2013.

These are merely a few of the basis reasons why the delay should be excused. I will soon by filing the amended complaint and effecting service on Apple and Hewlett Packard. I ask that

the Court permit me a little bit more time to file the amended complaint for these reasons.

Respectfully Submitted,

s/Chris Sevier/
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